

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE**

THOMAS A. EAMES, ROBERTA L. EAMES	)	
and TAMMY EAMES, on behalf of	)	
themselves and all others	)	
similarly situated,	)	
	)	
Plaintiffs,	)	C.A. No. 04-CV-1324KAJ
	)	
v.	)	
	)	
NATIONWIDE MUTUAL INSURANCE	)	
COMPANY,	)	
	)	
Defendant.	)	

**EAMES PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, plaintiffs Thomas A. Eames, Roberta L. Eames and Tammy Eames (collectively, the "Eames plaintiffs") propound the following written interrogatories to be answered by defendant Nationwide Mutual Insurance Company separately and fully in writing under oath, furnishing all such information as is available to defendant in response thereto (with defendant to furnish any additional information that it hereafter acquires as soon as it is acquired):

**Definitions**

1. References to "you", "your" or "Nationwide" are to the defendant Nationwide Mutual Insurance Company.
2. The term "PIP" refers to Personal Injury Protection or other first party "no fault" insurance benefits for medical expenses, lost earnings or funeral expenses provided or to be provided under policies of automobile insurance.

3. The term "document" shall have the broadest meaning permissible under the Federal Rules of Civil Procedure, and shall include (without limitation) documents created or stored by electronic means.

4. References to the "disputed practice" are to the characterization of any aspect of PIP (whether it be limits of liability, deductibles or otherwise) as "full", where such characterization is set forth in documents shared by Nationwide or its insurance agents with actual or prospective purchasers of automobile insurance, and regardless of whether Nationwide contends that such characterization is innocent or lawful.

5. The term "identify", when applied to documents, means to disclose the date, description or title, author(s), recipient(s), copyee(s) and subject matter(s) of that document.

6. The term "identify", when applied to persons, means to disclose the name, present or last known address, present or last known employer and present or last known job title or job description of that person.

#### **Interrogatories**

1. State whether Nationwide has engaged in the disputed practice in the State of Delaware, at any time since August 20, 2001.

2. If your answer to Interrogatory No. 1 above is in the affirmative, identify all persons with knowledge of the genesis, development, inception or origins of the disputed practice.

3. If your answer to Interrogatory No. 1 above is in the affirmative, identify all documents that refer or relate to the genesis, development, inception or origins of the disputed practice.

4. Has Nationwide ever communicated with its insurance agents in Delaware on the content or form of any form documents used by such agents in the sale of automobile insurance

in Delaware, including without limitation documents of the type shown at Tab A hereto, and documents used to quote "rates" or premiums for the purchase of such insurance?

5. If your answer to Interrogatory No. 4 above is in the affirmative, identify all persons with knowledge of the drafting, preparation, creation, editing or revision of the form documents to which Interrogatory No. 4 refers.

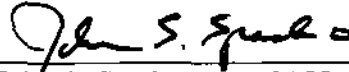
6. If your answer to Interrogatory No. 4 above is in the affirmative, identify all documents that refer or relate to the drafting, preparation, creation, editing or revision of the documents to which Interrogatory No. 4 refers.

7. With respect to any documents responsive to the Eames plaintiffs' First or Second Sets of Requests for Production of Documents, but withheld by you under claim of privilege or protection:

- a. Identify each such document;
- b. Describe each such document by type or title;
- c. State the date of each such document;
- d. Identify all authors, recipients and copyees of each such document;
- e. Describe in detail the subject matter of each such document; and
- f. Identify the precise privilege or protection you claim for each such document.

Respectfully submitted,

MURPHY SPADARO & LANDON

A handwritten signature in black ink, appearing to read "John S. Spadaro", is written over a horizontal line.

John S. Spadaro, No. 3155  
1011 Centre Road, Suite 210  
Wilmington, DE 19805  
(302)472-8100

Attorneys for plaintiffs  
Thomas A. Eames, Roberta L. Eames and Tammy  
Eames (on behalf of themselves and all others  
similarly situated)

September 16, 2005

# EXHIBIT A



Home Office:  
One Nationwide Plaza  
Columbus, OH 43215-2220

## AUTO MEMORANDUM OF INSURANCE

POLICY NUMBER:  
POLICY HOLDER:

POLICY EFF DATE:  
POLICY EXP DATE:

### IMPORTANT NOTICE

THIS MEMORANDUM OF INSURANCE PROVIDES BASIC INFORMATION REGARDING COVERAGE AND INTERESTS PROTECTED BY YOUR POLICY AS OF

### NATIONWIDE GENERAL INSURANCE COMPANY (23760)

4F2CZ04155KM05465

COMPREHENSIVE	ACV/OEM	
COLLISION	500/OEM	
LIABILITY	300000	
PERSONAL INJURY PROTECTION	FULL	
ADDITIONAL PERSONAL INJURY PROTECTION	85/270	
LOSS OF USE	40/1100	
TOWING AND LABOR	T&L	
POLICY COVERAGE		
UNINSURED MOTORIST	300000	PD SUBJECT TO 250 DED.

THIRD PARTY: LIENHOLDER

11943

DATE